

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

RELATED CORRESPONDENCE

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED  
USNRC

In the Matter of )  
UNION ELECTRIC COMPANY )  
(Callaway Plant, Unit 1) )

Docket No. STN 50-483 OL

'82 NOV -1 A11:16

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

JOHN G. KEED'S OBJECTIONS  
TO APPLICANT'S REVISED INTERROGATORIES

On 20 October 1982, Applicant submitted revised interrogatories to the undersigned. The undersigned objects to the following numbered interrogatories for the reasons specified herein:

QUESTION 4. Object to this question as it deals with matters which are beyond the scope of this hearing which only concerns contentions relating to radiological emergency response planning and activities.

QUESTION 5. Object to this question, see 4, above.

QUESTION 8, last part. Object, see 4, above.

QUESTIONS 20 and 21. Object, see 4, above.

QUESTION 29. Object, see 4, above.

QUESTION 30. Object, see 4, above.

QUESTION 33. Object, the amount of time required to perform a function is directly related to the skill level attained by the person performing such a function. My personal estimate of the time required to do a specific job would be based upon my capability which may or may not be relevant to another person.

QUESTION 36. Object, see 4, above.

QUESTION 41. Object, this interrogatory calls for a conclusion and a possible resolution to a problem. The undersigned is obligated only to prove that a contention is valid, not provide a resolution to a planning error or fault.

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QUESTION 44. Object, the undersigned is not basing any contention on a cost/benefit basis and does not accept Applicant's Response to Specified Reed Interrogatories served on the Callaway Court Administrative Judges and Emergency Management Coordinator, dated 23 July 1982, as a valid response from the persons on whom it was served; as such it is hear-say and has no basis in this hearing matter.

QUESTION 45. Object, see 41, above.

QUESTION 58. Object, see 41, above; additionally, this is a part of the planning process which has been undertaken by Union Electric Company (Messrs Stiller and White). Union Electric Company accepted this responsibility when it took over all local radiological emergency response planning for local governments.

QUESTION 59. Object, see 41 and 58, above.

QUESTION 60. Object, see 41 and 58, above.

QUESTION 66. Object, see 41 and 58, above.

QUESTION 67. Object, an answer calls for a conclusion based upon how Applicant appears to view a statement made independently of actual contentions.

QUESTION 71. Object, this question is without basis, since it is possible to envision the relief of all local governmental involvement in radiological emergency response planning, if one eliminates consideration of the provisions of NUREG 0654, I, E. Such a consideration is in contradiction with Commission guidance and policy.

QUESTION 74. Object to the final part of this question as frivolous and immaterial.

QUESTION 75. Object, see 74, above.

QUESTION 76. Object, see 4, above.

QUESTION 77. the form of this question takes in a multiplicity of

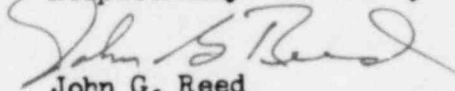
overlapping areas that are affected by seasonal weather conditions which have, in the past and may in the future, preclude travel from residences for days at a time. Snow-falls and ice storms affect the entire region; additionally this is a function of the planning process, see 58, above.

QUESTION 80. Object, a person cannot be expected to identify that which he or she does not know to be in existence.

QUESTION 90. Object, see 41, above.

END OF OBJECTIONS

Respectfully submitted,



John G. Reed  
Citizen of the United States  
of America

Dated this 27th day  
of October 1982 at  
Kingdom City, MO.

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CERTIFICATE OF SERVICE

I hereby certify that the document attached hereto was served this  
27<sup>th</sup> day of October, 1982 by deposit in the U.S. mail, first  
class postage prepaid upon the following:

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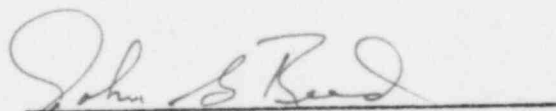
Atomic Safety and Licensing  
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\* hand delivered

  
John G. Reed  
Citizen of the United States  
of America